

# STATE OF VERMONT BOARD OF MEDICAL PRACTICE

In re: Stephanie H. Taylor, M.D.	)	Docket Nos.: MPS 45-0304; MPS 48-0304
a/k/a Stephanie Taylor Tasi, M.D.	)	MPS 120-1195; MPS 79-0795
	)	MPS 72-0795; MPS 52-0595
	)	MPS 129-1194; MPS 61-0594
	)	

## STATE'S REPLY TO RESPONDENT'S REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW, the State of Vermont, by and through Attorney General William H. Sorrell and undersigned Assistant Attorney General, James S. Arisman, and files this reply to Respondent's Request for Production of Documents.

1. By written request, dated October 21, 2004, Stephanie H. Taylor, M.D., a/k/a Stephanie Taylor Tasi, M.D., Respondent, asks that the Board of Medical Practice produce for inspection and copying written documentation related to the State's Specification of Charges against her. Such charges were filed by the State on September 3, 2004.

2. Respondent requests from the Board certain written documentation, as identified in 11 numbered paragraphs. The State understands Respondent's motion to seek such documentation as is provided for in 26 V.S.A. § 1318(c), *i.e.*, "all information in the possession of the department of health pertaining to the licensee" and, pursuant to statutory provision, expressly excluding those "investigatory files which have not resulted in charges of unprofessional conduct and attorney work product". (Emphasis added.) Thus, the State does not oppose Respondent's request.

3. The State requests that it be provided duplicate copies of all material produced by the Board, pursuant to Respondent's request, as described above. The State requests that

the duplicate copies be produced in the same organization and form as those provided to Respondent.

4. Board Rule 16.2 provides for pre-hearing and discovery conferences and Board orders regulating “discovery and depositions, scheduling, motions by the parties, and such other matters as may be necessary to ensure orderly preparation for hearing.” As of this date, the Board has not held a pre-hearing or discovery conference or issued an order with regard to discovery, scheduling, and/or motions in this matter.

5. The State does not request at this time any action by the Board pursuant to Rule 16.2. However, the State urges that on or before the date that Respondent files her written response to the Board as to the State’s Specification of Charges, that discovery in this matter be deemed to encompass prompt production to the State by Respondent complete, accurate, and legible copies of all written documentation, statements, and other evidence acquired by her from third parties relating in any way to the State’s charges. See Paragraphs 3 and 4 of Respondent’s Motion Requesting Additional Enlargement of Time. The State requests that such documentation be accompanied by copies of any and all written or other communications to or from each custodian, possessor, or author who has produced such documentation to Respondent, with the date of receipt by Respondent.

6. The State takes no other position as to Respondent’s request for production.

Dated at Montpelier, Vermont this 29th day of October 2004.

STATE OF VERMONT

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by:

  
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